

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 5:18-cr-61-1-2
	)	
SAM BENT and	)	
DJENEBA BENT,	)	
Defendants.	)	

**DEFENDANT'S MOTION TO EXTEND MOTIONS FILING DEADLINE**

NOW COMES the Defendant, Sam Bent, by and through his attorney, Stephanie M. Greenlees, Esq., and hereby moves this Honorable Court for a sixty (60) day extension to the motions filing deadline in the above-captioned criminal proceeding. As grounds for this motion, Defendant states as follows:

The current motions filing deadline in this matter is set for November 5, 2018. As of the date of this motion, Defendant has not yet obtained a complete of the discovery from the Government. Defendant's undersigned counsel has notified the Government of the outstanding discovery and requested it be produced. An additional period of sixty (60) days is necessary so Defendant may obtain a complete copy of the discovery, review the discovery of which is highly complex given the nature of underlying charges, and to prepare and file motions.

Defendant agrees that the deadline for filing motions should be extended and he recognizes that any additional time granted will be excluded from computation under the Speedy Trial Act. 18 U.S.C. §3161(h)(1)(D)(excluding time resulting from filing of motions). The ends of justice will be served by granting this extension as it will provide Defendant the "reasonable

time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. §3161(h)(8)(A).

Undersigned counsel has communicated with counsel for the Government, Assistant United States Attorney Michael Drescher, and counsel for Defendant Djeneba Bent, Assistant Federal Defender David McColgin, regarding this request for an extension of the motions filing deadline. AUSA Drescher and Attorney McColgin have no objection.

WHEREFORE, Defendant respectfully requests that the Court grant this motion to extend the motions filing deadline by sixty (60) days and the attached proposed Order.

DATED at Burlington, Vermont this 25<sup>th</sup> day of October, 2018.

Respectfully Submitted By,

SAM BENT  
By Counsel

KAPLAN AND KAPLAN

By: /s/ Stephanie M. Greenlees  
Stephanie M. Greenlees, Esq.  
95 St. Paul Street, Suite 405  
Burlington, Vermont 05401  
(802) 651-0013  
(802) 448-3478 (f)  
[sgreenlees@kaplanlawvt.com](mailto:sgreenlees@kaplanlawvt.com)

KAPLAN AND KAPLAN  
ATTORNEYS AT LAW

PARK PLAZA - SUITE 405  
95 ST. PAUL STREET  
PO BOX 405  
BURLINGTON, VT 05402  
(802) 651-0013